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9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 CARRA OTTO, as the surviving spouse of
12 RICHARD OTTO; and CARRA OTTO as
13 the Administratrix of the Estate of
14 RICHARD OTTO,

15 Plaintiffs,

16 v.

17 REFACCIONES NEUMATICAS LA PAZ,
18 S.A. DE C.V.; MIDWESTERN, LLC; ABC
19 CORPORATIONS I-X, inclusive; BLACK
20 AND WHITE COMPANIES I-X, inclusive,
21 and JOHN DOES I-X, inclusive,

22 Defendants.

23 AND RELATED ACTIONS

Case No. 3:16-CV-00451-MMD-WGC

ORDER RE:

**ERRATA TO STIPULATION FOR
EXTENSION OF TIME TO FILE
OPPOSITIONS AND REPLIES (First
Request)**

24 COMES NOW Plaintiff CARRA OTTO, as the surviving spouse of RICHARD OTTO and
25 as the Administratrix of the Estate of RICHARD OTTO and Defendants REFACCIONES
26 NEUMATICAS LA PAZ, S.A. DE C.V. (Hereinafter RNP) and MIDWESTERN, LLC, by and
27 through their respective counsels and hereby stipulate the following:

28 Currently before the Court are the following: Defendant RNP's Motion for Summary
Judgment filed May 30, 2019 (ECF #165); Defendant RNP's Motion to Exclude Quent Augspurger's
Expert Opinions and Testimony filed May 31, 2019 (#166); and Defendant Mid-Western, LLC's
Motion for Summary Judgment filed May 31, 2019 (ECF #167). Said Opposition to #165 is
currently due Thursday, June 20, 2019, opposition to #166 is due today, June 14, 2019 and said
opposition to #167 is due Friday, June 21, 2019.

1 Plaintiffs' counsel just finished a two week trial in Carson City, *Angel v. Brabender, et al.*,
2 First Judicial Court Case Number 17- TRT 00049 1B on June 6, 2019 and immediately had to start
3 preparing for expert depositions out of State in a Complex Products Liability case that is scheduled
4 for a four week trial to begin on August 4, 2019, *Robinson v. Crown, et al.*, Second Judicial District
5 Court Case no. CV17-02384. Plaintiffs' counsel is currently in Portland, Oregon for one of these
6 depositions and will be traveling to Dayton, Ohio on June 25th for another deposition and Memphis,
7 Tennessee immediately from Dayton, Ohio and arriving back in Reno on June 28, 2019. In addition,
8 Plaintiff's counsel has depositions in two other cases scheduled for Monday June 17, 2019 in Las
9 Vegas Nevada and on June 20, 2019 here in Reno, Nevada.

10 In addition, Plaintiffs' counsel has been served with one Motion for Summary Judgment in
11 the *Robinson v. Crown* case that is due on Monday, June 24, 2019 and an Ex Parte Motion to file a
12 Motion for Summary Judgment today, June 14, 2019 in which they were seeking leave from the
13 court for the Motion to be in excess of 15 pages. The deadline for filing said Motion for Summary
14 Judgment is today and Plaintiff's opposition shall be due July 12, 2019. Finally, the Motions in
15 Limine are due shortly in the *Robinson v. Crown* case and there is a Stipulation regarding the
16 briefing deadlines that has been filed with the Court which states the Motions for Summary
17 Judgment are to be filed today, June 14, 2019, any oppositions to the same are to be filed Friday,
18 June 28, 2019 and any replies to the same are to be filed by July 5, 2019. With regard to the Motions
19 in Limine, they are to be filed on June 28, 2019, oppositions are to be filed on July 12, 2019 and
20 Replies are due on or before July 19, 2019.

21 Finally, Plaintiffs' counsel has an Appellant Reply Brief due to the Nevada Supreme Court
22 on July 17, 2019.

23 This is the first request for an extension of time regarding ECF documents #165, #166, and
24 #167

25 Due to the above foregoing, Defense counsel for all parties have agreed to grant Plaintiffs
26 an extension of time to file all three oppositions to #165, #166, and #167 on or before Tuesday, July
27 30, 2019.

28 Plaintiffs have agreed that Defendants shall have until August 20, 2019 in which to file their

1 Replies to said oppositions.

2 Dated this 14th day of June 2019.

Dated this 14th day of June 2019.

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4 BRADLEY, DRENDEL & JEANNEY

GLOGOVAC & PINTAR

5 /s/ William C. Jeanney
6 William C. Jeanney, Esq.
7 *Attorneys for Plaintiffs*

/s/ Michael Pintar
Michael Pintar, Esq.
Attorneys for Defendant RNP

8
9 Dated this 14th day of June 2019.

10 THORNDAL, BALKENBUSH & EISINGER

11
12 /s/ Stephen C. Balkenbush
13 Stephen C. Balkenbush, Esq.
Attorneys for Defendant Midwestern, LLC

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17 It is so ordered.

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19 Miranda M. Du
20 United States District Judge

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22 Dated June 17th, 2019.
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